

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Caitlin Baunsgard
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 19 2022

SEAN F. McAVOY, CLERK DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

No. 2:22-CR-9-WFN

Plaintiff,

INDICTMENT

v.

BRANDELYN E. LABRUM,

21 U.S.C. § 841(a)(1),
(b)(1)(B)(viii),
Possession with Intent to
Distribute 5 Grams or More of
Actual (Pure) Methamphetamine
(Count 1)

Defendant.

21 U.S.C. § 841(a)(1), (b)(1)(C),
Possession with Intent to
Distribute Heroin
(Count 2)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT ONE

On or about December 12, 2019, in the Eastern District of Washington, the
Defendant, BRANDELYN E. LABRUM, knowingly and intentionally possessed with

1 the intent to distribute 5 grams or more of actual (pure) methamphetamine, a Schedule
2 II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

3 COUNT TWO
4

5 On or about December 12, 2019, in the Eastern District of Washington, the
6 Defendant, BRANDELYN E. LABRUM, knowingly and intentionally possessed with
7 the intent to distribute a mixture or substance containing a detectable amount of
8 heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1),
9 (b)(1)(C).

10 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS
11

12 The allegations contained in this Indictment are hereby re-alleged and incorporated
13 by reference for the purpose of alleging forfeitures.

14 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
15 U.S.C. § 841, as set forth in this Indictment, Defendant, BRANDELYN E. LABRUM,
16 shall forfeit to the United States of America, any property constituting, or derived
17 from, any proceeds obtained, directly or indirectly, as the result of such offense and
18 any property used or intended to be used, in any manner or part, to commit or to
19 facilitate the commission of the offense.

20 If any forfeitable property, as a result of any act or omission of the Defendant:

- 21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred or sold to, or deposited with, a third party;
23 c. has been placed beyond the jurisdiction of the court;

- 1 d. has been substantially diminished in value; or
2 e. has been commingled with other property which cannot be
3 divided without difficulty,

4 the United States of America shall be entitled to forfeiture of substitute property pursuant
5 to 21 U.S.C. § 853(p).

6 Dated: January 11^m, 2022.

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